

Response to Comments

Las Virgenes Municipal Water District
Tapia Water Reclamation Facility
Tentative Time Schedule Order (TSO) No. R4-2017-0125-A01
NPDES No. CA0056014

Comment Letter dated June 17, 2022, from the Las Virgenes Municipal Water District (LVMWD)

#	Comments	Response	Action Taken
1	LVMWD requests that the TSO acknowledge the minimal impact of the discharges that occur at such a low frequency and further reduction of the discharge when the Pure Water project is operational by 2030.	The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) acknowledges that the Tapia Water Reclamation Facility (WRF) discharges intermittently and infrequently to Los Angeles River and that the Pure Water Project is expected to reduce chloride loading to the river. The impacts on beneficial uses and the expected reductions in chloride loading due to the Pure Water project can be addressed by LVMWD as reflected in Table 3.	None necessary.
2	LVMWD requests that the Regional Board consider alternative approaches to establishing effluent limitations that are more representative of the discharge's impact on the river and beneficial uses, such as establishing a monthly average mass-based limitation.	Table 3 of the Tentative TSO requires LVMWD to submit an updated Antidegradation Study which must include a description of the baseline assimilative capacity and the percent capacity the discharge will use in the Los Angeles River watershed and the San Fernando Valley Groundwater Basin. In order to determine the percent of the assimilative capacity the discharge uses within the watershed and the groundwater basin, a discussion of the mass of chloride in the watershed, the groundwater basin, and within the discharge will be required	None necessary.

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		<p>in the study. LVMWD may propose a mass-based average monthly effluent limitation based on the information submitted in compliance with the TSO for consideration by the Los Angeles Water Board.</p>	
3	<p>The second milestone in Table 3, Tapia WRF Milestone Schedule, states that LVMWD will: “<i>Submit a work plan identifying strategies to reduce chloride concentrations to achieve the current chloride effluent limit of 150 mg/l.</i>”</p> <p>The identification of available strategies was initially conducted as part of the 2017 TSO milestone to prepare an ‘<i>Identification of Options Report</i>’. As part of that evaluation the technical and economic feasibility of source control strategies was evaluated and it was determined that the evaluated strategies were not economically and/or technically feasible. However, LVMWD will update the previously submitted evaluation for the strategies listed in the TSO milestone including the Pure Water Project, expansion of the current recycled water program, dry weather diversion to the sewer, and other strategies that may be identified to reduce chloride discharges to determine if any factors have changed that would change the previous assessment of technical and economic feasibility. As noted</p>	<p>The Los Angeles Water Board acknowledges that LVMWD previously submitted an <i>Identification of Options Report</i>, but the intent of this milestone in the Tentative TSO is for LVMWD to revisit the potential options to reduce chloride below the final effluent limitation for chloride of 150 mg/L and to implement those options if a site specific objective is not adopted. The requested language modification is not necessary; LVMWD can include an assessment of technical and economic feasibility in identifying strategies to reduce chloride concentrations to achieve the current chloride effluent limit of 150 mg/l. However, LVMWD needs to have a plan in place by the milestone due date to comply with the final effluent limitation for chloride of 150 mg/L if a site specific objective is not adopted.</p>	None necessary.

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	<p>above, LVMWD is actively pursuing options that will reduce chloride discharges to the Los Angeles River. However, while chloride reductions are expected to result from these efforts, it is uncertain that a strategy will be identified that would fully achieve the needed reduction. Therefore, LVMWD requests that the milestone be modified to add that the strategies will be evaluated for technical and economic feasibility.</p>		
4	<p>The milestone in Table 3 requiring an updated Antidegradation Study includes, in Item 2, an <i>'analysis of the draft San Fernando Valley SNMP and loading factors'</i>. Because it is unclear what is being referred to with respect to the SNMP and loading factors, LVMWD would request that Item 2 of the milestone be modified to state <i>'Analysis of the discharge's impact to the underlying groundwater basin'</i>.</p>	<p>The Los Angeles Water Board included an analysis of the San Fernando Valley SNMP in the Tentative TSO as an example of where information could be gathered to support the antidegradation study, but since this document has not been completed it may be difficult to draw conclusions from it. LVMWD may also use groundwater data from other sources in addition to the draft San Fernando Valley SNMP. In addition, the reference to "loading factors" was meant to describe the mass loading of chloride to the San Fernando Basin, which is already described in the last requirement of this milestone describing the baseline assimilative capacity. Since the intent of this requirement is to analyze the discharge's impact on the groundwater basin using all available data, the requested change is acceptable.</p>	<p>The requested revision to Table 3 was made to the Tentative TSO.</p>

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5	<p>In finding 18, the TSO states that <i>'Discharge from Discharge Point 005 will be necessary to implement the recycled water project'</i>. LVMWD requests that this statement be modified to state that <i>'intermittent discharge from Discharge Point 005 is necessary, due to wet weather conditions, to effectively manage operation of its extensive recycled water facilities and meeting Tapia's NPDES requirements associated with the Malibu Creek seasonal discharge prohibition and implementation of the recycled water project'</i>.</p>	<p>The requested language more accurately clarifies LVMWD's need to continue discharging to the Los Angeles River, so the language was revised with minor modifications as follows:</p> <p><i>"Intermittent discharge from Discharge Point 005 is necessary, due to wet weather conditions, to effectively manage operation of Tapia WRF's extensive recycled water facilities, to meet its NPDES requirements associated with the Malibu Creek seasonal discharge prohibition, and to implement the recycled water project."</i></p>	<p>Revisions to finding 18 were made to the Tentative TSO.</p>
6	<p>In Finding 13.o., it is stated that there is <i>'diversion of a small amount of sewage sludge to the City of Los Angeles' system'</i>. LVMWD requests that <i>'sewage sludge'</i> be changed to <i>'untreated wastewater'</i> to more accurately reflect what is being diverted.</p>	<p>The requested language more accurately describes how LVMWD's sewer system is connected to the City of Los Angeles' sewer system. The Los Angeles Water Board agrees to replace "sewage sludge" with "untreated wastewater" in Finding 13.o.</p>	<p>The requested revision to Finding 13.o. was made to the Tentative TSO.</p>